

EXHIBIT D
UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

In re:
Erin Owens
Debtor

Case No.10-53504 wsd
Chapter 13
Honorable Walter Shapero

Erin Owens
Plaintiff

Adv. Proc. No.10-05320

v.

Bank of America
Defendant

AFFIDAVIT IN SUPPORT OF REQUEST FOR DEFAULT JUDGMENT
AGAINST DEFENDANT BANK OF AMERICA

I, Robert Keyes, being duly sworn, depose and say:

1. This Affidavit is made upon firsthand knowledge and I am fully competent to testify as to all facts set forth herein;
2. I am an attorney with Robert Keyes Law, counsel for the Plaintiff in the above captioned Adversary Proceeding 10-05320-wsd.
3. This Affidavit is made in support of Plaintiff's Request for Clerk's Entry of Default against the Defendant, Bank of America.
4. A summons was issued by the Court against the Defendant in this matter on April 26, 2010, and the Defendant was served on April 26, 2010.
5. Pursuant to the Summons and Bankruptcy Rule 7012(a), the Defendant was required to file an answer to the Complaint within thirty (30) days of the date of issuance of the Summons.
6. As of the date of this Affidavit, the Defendant has failed to plead or otherwise defend against the action taken by Plaintiff.

7. To the best of my knowledge upon reasonable inquiry, the Defendant is not a member of the military service, or incompetent and the relief requested is for a sum certain.

/s/ John Robert Keyes
Robert Keyes P68856
Attorney for Plaintiff
Robert Keyes Law
300 North Huron Street
Ypsilanti, MI 48197
(734) 662-1590
robert@robertkeyeslaw.com

Subscribed and sworn to before me this 9th, day of June, 2010

/s/ Gregory L. Dodd

Notary Public, State of Michigan, County of Washtenaw

My commission expires: February 2, 2015

Acting in Washtenaw County